

Honorable Barbara J. Rothstein

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

JULIAN CASTRO and CATHERINE
CASTRO, husband and wife,

Plaintiffs,

vs.

STATE FARM FIRE & CASUALTY
COMPANY, a foreign company,

Defendant.

No. 2:24-cv-883-BJR

**STIPULATED MOTION AND ORDER
AMENDING CASE SCHEDULE**

I. STIPULATION AND RELIEF REQUESTED

Pursuant to LCR 10(g) and 16(b)(6), the parties respectfully request the Court continue the current trial date and all pre-trial deadlines by 120 days and issue a new Scheduling Order reflecting the same. The parties have conferred, and this motion is stipulated.

Good cause exists to modify the case schedule. The parties have been working to narrow the issues in dispute and have planned to exchange proposals for final resolution of the case as a whole. Given the expert disclosures and the time period to complete discovery, the parties request the continuance to allow completion of discovery in effort to resolve or bring dispositive motions to narrow the relevant issues for trial.

Additionally, counsel for State Farm has another trial scheduled in the Eastern District of Washington for the United States District Court beginning on December 8, 2025. Given this conflict, the parties further believe good cause exists to continue the trial date and related dates.

II. STATEMENT OF FACTS

The Parties have been pursuing resolution of this case. Currently Defendant has made all undisputed benefit payments under the applicable insurance policy. The parties have also been discussing possible settlement of the remaining claims and Plaintiff is in the process of preparing a demand with respect to the unresolved portions of the claim. The parties are hopeful that the remaining issues in the case can be resolved by negotiation and wish to off the costs of further discovery and trial preparations. The parties are jointly seeking a continuance in this matter of all deadlines as follows:

Description	Current Date	Proposed Date
Jury Trial	12/08/25	04/07/26
Disclosure of expert testimony under FRCP 26(a)(2)	05/12/25	09/09/25
Discovery completed by	06/11/25	10/08/25
All dispositive motions must be filed by	07/11/25	11/10/25
All motions in limine must be filed by	10/29/25	02/26/26
Joint Pretrial Statement	11/10/25	03/10/26
Pretrial conference scheduled	11/25/25	03/25/26

III. ARGUMENT

A. Applicable Legal Standard

“A [case] schedule may be modified only for good cause and with the judge’s consent.” Fed. R. Civ. P. 16(b)(4). *See also* LCR 16(b)(6) (“A schedule may be modified only for good cause and with the judge’s consent.”). The decision to modify a scheduling order is within the

broad discretion of the district court. *See Johnson v. Mammoth Recreations, Inc.*, 975 F.2d 604, 607 (9th Cir. 1992).

B. Good Cause Exists to Modify the Trial Date and Case Schedule

Good cause exists to amend the trial deadlines in this matter as outlined above in the introduction. The parties have been working to narrow the issues in dispute and have planned to exchange proposals for final resolution of the case as a whole. Given the expert disclosures and the time period to complete discovery, the parties request the continuance to allow completion of discovery in effort to resolve or bring dispositive motions to narrow the relevant issues for trial.

Additionally, counsel for State Farm has another trial scheduled in the Eastern District of Washington for the United States District Court beginning on December 8, 2025. Given this conflict, the parties further believe good cause exists to continue the trial date and related dates.

IV. ORDER

After consideration of the Stipulated Motion to Amend Case Schedule, and the Court being fully advised on the premises, it is hereby ORDERED that the Parties' Stipulated Motion is **GRANTED**. The case schedule is amended as follows:

Description	Previous Date	Amended Date
Jury Trial	12/08/25	04/07/26
Disclosure of expert testimony under FRCP 26(a)(2)	05/12/25	09/09/25
Discovery completed by	06/11/25	10/08/25
All dispositive motions must be filed by	07/11/25	11/10/25
All motions in limine must be filed by	10/29/25	02/26/26
Joint Pretrial Statement	11/10/25	03/10/26
Pretrial conference scheduled	11/25/25	03/25/26

1 Dated this 13th day of May 2025.

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4 Barbara J. Rothstein
5 United States District Court Judge

6 Presented by:

7 FORSBERG & UMLAUF, P.S.

8 s/ Ryan J. Hesselgesser

9 Ryan J. Hesselgesser, WSBA #40720

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11 POLI, MOON & ZANE, PLLC

12 s/ Robert D. Bohm, for (via email approval)

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14 *Attorneys for Plaintiff*

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